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INTERNATIONAL LAW—CESSION OF TERRITORY—EFFECT UPON NATIONALITY OF INHABITANTS.—The plaintiff was born in 1881 in Dobritch, then in Bulgaria. In 1902 he removed to France permanently. In 1913 under the treaty of Bucharest terminating the second Balkan war, Dobritch, by a rectification of frontiers, was ceded to Rumania. Subsequently he had received Rumanian passports. The defendant objected to the prosecution of the suit on the ground that the plaintiff was of Bulgarian nationality, hence an alien enemy. *Held*, that the action could not be maintained. *Burgard v. Mair* (*Tribunal Civil de Saint Etienne*, June 7, 1916) reported in (1917) 44 CLUNET 193.

The opinion states that while birth in the territory conferred nationality, cession of the territory, being but a rectification of frontiers, did not change the nationality of those not actually domiciled in it, *i. e.*, of those domiciled abroad. It would seem that had it involved the cession of a geographical province or of a state, instead of a small undefined portion of territory, it might have carried with it a change of nationality of those born in it, even though domiciled abroad. No other case presenting the same problem has been found in the reports or literature examined.

INTERNATIONAL LAW—MILITARY OCCUPATION OF ENEMY TERRITORY—SUBSTITUTION OF AUTHORITY OF OCCUPANT.—The defendant, who was arrested in a part of Russian Poland occupied by Germany, was tried in Germany. He claimed that he was held illegally, having been taken into Germany without extradition proceedings and without consent of the Russian authorities. *Held*, that his arrest and trial were lawful, because while occupied enemy territory remains enemy and does not become national territory by the occupation, the occupant exercises jurisdiction therein in matters of public law in substitution for the replaced authority of the original sovereign and this jurisdiction warrants the arrest of criminal offenders there and their trial in the national courts of the occupant without any necessity for extradition proceedings. *Judgment IV. 407/15* (Supreme Court of Germany in Criminal Cases, July 26, 1915) reported in (1916) 21 DEUTSCHE JURISTENZEITUNG 134, also reported in (1917) 44 CLUNET 260.

STATUTE OF FRAUDS—PART PERFORMANCE—PAYMENT OF RENT IN ADVANCE.—The defendant made a verbal agreement to grant a lease of a farm to the plaintiff. The latter, who had not taken possession of the farm, paid an installment of rent in advance. In an action for specific performance of the agreement the defendant pleaded the Statute of Frauds. *Held*, that the payment of rent without taking possession did not remove the case from the operation of the Statute. *Chaprione v. Lambert* (C. A.) [1917] 2 Ch. 356.

This is the first decision on the point in the English Court of Appeals and follows and approves *Thursly v. Eccles* (1900) 49 W. R. 281. It has, of course, been long settled that the mere payment of the purchase price is not a sufficient act of part performance to entitle the purchaser to specific performance of an oral contract.

TELEGRAPHS AND TELEPHONES—DISCRIMINATION—EXCHANGE OF SERVICES WITH RAILROAD.—In 1888 the defendant telegraph company contracted for an exchange of services with the plaintiff railroad company. The contract provided for two kinds of service by the telegraph company, "on-line" service, being the carrying of messages for the railroad company along the common line of the two companies, and "off-line" service, being the carrying of messages to points beyond the line of the railroad. The 1910 amendment to the Interstate Commerce Act brought telegraph companies within the operation of the